

REMARKS

Claims 1-12 are currently pending, wherein claims 1 and 7 are independent. Favorable reconsideration is respectfully requested in view of the remarks presented herein.

Applicants note the indication on page 2 that claims 5 and 11 contain allowable subject matter.

On page 3 of the Office action ("Action"), the Examiner rejects claims 1-6, 6-10, and 12 under 35 U.S.C. § 103(a) as being unpatentable over European Publication No. EP 1328114 to Allizon et al. ("Allizon"), in view of U.S. Patent No. 6,097,757 to Boice et al. ("Boice"). Applicants respectfully traverse this rejection.

In order to support a rejection under 35 U.S.C. § 103, the Examiner must establish a *prima facie* case of obviousness. To establish a *prima facie* case of obviousness three criteria must be met. First, there must be some rationale to combine the cited references. Second, there must be a reasonable expectation of success. Finally, the combination must teach each and every claimed element. In the present case, claims 1-6, 6-10, and 12 are patentable over the combination of Allizon and Boice for at least the reason that the combination fails to disclose each and every claimed element. More specifically, the combination fails to disclose or suggest a display unit having an image enhancing unit that obtains a correction target region of designated monomedia data in the composite video frame in response to scaling/combing control information as claimed.

In rejecting claim 1, the Examiner asserts that Allizon discloses obtaining a *correction target region* as claimed in as much as Allizon discloses that "the corresponding transformed layer (6012, 6022, 6032, 6042, 6052) are combined to form the composite output image (6060) based on the resolution of the television" which according to the Examiner is equivalent to the claimed target region. The Examiner's assertion is unfounded.

Although, Allizon discloses correcting (i.e., upscaling or downscaling) each of the plurality of image layers (6010, 6020, 6030, 6040, and 6050) into a plurality of transformed layers (6012, 6022, 6032, 6042, and 6052, respectively) and combining the transformed layers into a composite image 6060 having a desire resolution, nowhere in Allizon is there any disclosure or suggestion of obtaining a *region* of the composite image 6060. Therefore, the

output resolution of the composite image 6060 is not equivalent to the claimed *correction target region*.”

Boice discloses a system and method for adaptively encoding in hardware or software, or a combination thereof, a sequence of video frames. However, Boice fails to overcome the deficiencies of Allizon.

Since Allizon and Boice both fail to disclose or suggest a display unit having an image enhancing unit that obtains a correction target region of designated monomedia data in the composite video frame in response to scaling/combing control information as claimed, the combination of these two references cannot possibly disclose or suggest said element. Therefore, even if one skilled in the art had some rationale to combine Allizon and Boice (which Applicants do not concede), the combination would still fail to render claim 1 unpatentable because the combination fails to disclose each and every claimed element.

Independent claim 7 defines a method for operating a display unit that includes, *inter alia*, providing an image enhancing unit obtaining a correction target region of designated monomedia data in the composite video frame in response to the scaling/combining control information, generating correction data by obtaining interframe difference in the correction target region, and generating a video frame by carrying out image enhancing processing of the correction target region in response to the correction data generated. Accordingly, independent claim 7 is patentable over the combination of Allizon and Boice for at least those reasons presented above with respect to claim 1.

Claims 2-4, 6, 8-10, and 12 variously depend from independent claims 1 and 7. Therefore, claims 2-4, 6, 8-10, and 12 are patentable over the combination of Allizon and Boice for at least those reasons presented above with respect to claims 1 and 7. Reconsideration and withdrawal of the rejection of claims 1-4, 6-10, and 12 under 35 U.S.C. § 103(a) is respectfully requested.

The application is in condition for allowance. Notice of same is earnestly solicited. Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Penny Caudle Reg. No. 46,607 at the telephone

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number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

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